

**Fill in this information to identify the case:**

David G. Silvat  
Debtor(s)

**UNITED STATES BANKRUPTCY COURT FOR THE: WESTERN  
DISTRICT OF PENNSYLVANIA**  
Chapter 13 Case Number: 14-22994-CMB

**FORM 4100R**

**RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**PART 1: Mortgage Information**

**Name of creditor:** AJX MORTGAGE TRUST I, A DELAWARE TRUST, WILMINGTON SAVINGS FUND SOCIETY, FSB, TRUSTEE

**Court claim no.** (if known): 3-2

**Last four digits** of any number you use to identify the debtor's account: 1571

**Property Address:** 1067 Silver Lane, McKees Rocks, PA 15136-1148

**PART 2: Pre-Petition Default Payments:**

Check one:

- ☒ Creditor agrees that Debtor(s) has/have paid in full the amount required to cure the default on Creditor's claim
- ☐ Creditor disagrees that Debtor(s) has/have paid in full the amount required to cure the pre-petition default on Creditor's claim. Creditor asserts that the total amount due to cure the pre-petition amount remaining unpaid is:

**Total Amount Due:** \$ \_\_\_\_

**PART 3: Post-Petition Mortgage Payments**

Check One

☒ Creditor states that the debtor(s) are current with all post-petition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

The next post-petition payment from the debtor(s) is due on: 12/01/2019

☐ Creditor states that the debtor(s) are not current on all post-petition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

(a) Total post-petition ongoing payments due:

(a) \$ \_\_\_\_

(b) Total fees, charges, expenses, escrow and costs outstanding:

(b) \$ \_\_\_\_

(c) **Total.** Add lines a and b.

(c) \$ \_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the post-petition payment(s) that first became due: \_\_\_\_\_

Debtor(s): David G. Silvat

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#### PART 4: Itemized Payment History

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

#### PART 5: Sign Here

The person completing this Response must sign it. The response must be filed as a supplement to the creditor's Proof of Claim.

Check the appropriate box.

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

**X/s/ Harry B. Reese, Esquire**

Jill Manuel-Coughlin, Esquire  
Harry B. Reese, Esquire

**Date:** 10/23/2019

**Title:** Attorney

**Print:** Jill Manuel-Coughlin, Esquire  
Harry B. Reese, Esquire

**Company:** Powers Kirn, LLC

**Address:** 8 Neshaminy Interplex, Suite 215  
Trevose, PA 19053

**E-Mail:** [bankruptcy@powerskirn.com](mailto:bankruptcy@powerskirn.com)

**Contact Phone:** 215-942-2030

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: David G. Silvat  AJX MORTGAGE TRUST I, A DELAWARE TRUST, WILMINGTON SAVINGS FUND SOCIETY, FSB, TRUSTEE  v. David G. Silvat	Debtor(s)     Movant  Debtor(s)	Case No. 14-22994-CMB
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Statement in Response to Notice of Final Cure Payment was served on the parties listed below by postage-prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on October 23, 2019.

**Parties Served via Electronic Notification:**

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Attorney for Debtor(s)

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600 Grant Street  
Pittsburgh, PA 15219  
[cmecf@chapter13trusteedpa.com](mailto:cmecf@chapter13trusteedpa.com)  
Trustee

**Parties Serviced via First Class Mail:**

David G. Silvat  
1067 Silver Lane  
Mc Kees Rocks, PA 15136  
Debtor(s)

**/s/ Harry B. Reese, Esquire**  
POWERS KIRN, LLC  
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Harry B. Reese, Esquire; Atty ID #310501  
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Attorney for Movant  
Dated: October 23, 2019